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October 3, 2011

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-B204  
Washington, DC 20554

Re: Ex Parte Discussion (CC Docket 02-6; GN 09-51)

Dear Ms. Dortch:

This letter is to inform you of an *ex parte* discussion on September 27, 2011, between staff in the Wireline Competition Bureau at the Commission and representatives from urban school districts. The subject of the discussion was ways to improve and streamline the E-Rate program for applicants, the Administrator, and the Commission. The meeting took place at the FCC headquarters in Washington, DC, and was organized by Manish Naik from the Council of the Great City Schools, who also attended the meeting. The staff from the Commission that was present included: Regina Brown, James Bachtell, Rebekah Bina, and Gina Spade (via telephone). The school district staff that participated included: James Alther (Los Angeles Unified School District), Jennifer Gardner (School District of Philadelphia), Ilze Lacis (Cleveland Metropolitan School District), and Anthony Machado (Miami-Dade County Public Schools).

At the meeting, the discussion began with urban schools proposing a way to streamline paperwork and reviews through a quicker approval process for Priority One requests that were unchanged from previous years. In order to receive the best cost from vendors, districts often enter into multi-year contracts for specific services. Participants from urban schools explained that despite a contract and service being the same as the one approved in the previous year, district applicants often had to undergo identical review processes and PIA audits year after year, with no actual benefit to the applicant or Administrator. There was also discussion about inefficiency in the BEAR process, in which applicants that had paid the full cost of eligible services up-front were subjected to a sometimes lengthy waiting period as reimbursements unnecessarily flowed from USAC to vendors before finally reaching the school district.

Discussion also covered the importance of basic maintenance to school districts, and the cost savings that could be realized for districts and the USF with predictable,

annual reimbursements for regular maintenance services. A similar discussion was also had surrounding network monitoring services, which one district demonstrated that, if eligible, could lower by about 30 percent the “time and material” basic maintenance cost on internal connections that they currently receive from the E-Rate program. This also led to a short discussion on the importance of cost effectiveness, and the applicant community’s need to receive better information about the cost effectiveness criteria and measures that are applied by USAC in reviewing and approving applications.

Two additional areas were discussed, including districts attempting to better understand the Commission’s policy on applicants applying for network access for multiple devices, sometimes by a single user. Finally, urban schools talked about the extremely challenging financial situation that all districts are in, and the need for the Administrator to provide better communications about pending applications, and the importance for the Commission to keep the classrooms running and not propose major changes to the E-Rate program that could put shift funding away from current services.

The Council of the Great City Schools appreciates the time taken by FCC staff to discuss this important program, and we offer our continual assistance as the Commission works to improve and strengthen the E-Rate for the future. Please do not hesitate to contact me, or Manish Naik on my staff, for any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. Casserly".

Michael D. Casserly  
Executive Director

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